

RICHARDS, LAYTON & FINGER

A PROFESSIONAL ASSOCIATION

ONE RODNEY SQUARE

920 NORTH KING STREET

WILMINGTON, DELAWARE 19801

(302) 651-7700

FAX (302) 651-7701

WWW.RLF.COM

JENNIFER C. JAUFFRET
DIRECTOR

DIRECT DIAL NUMBER
302-651-7568
JAUFFRET@RLF.COM

September 17, 2007

INTERIM STATUS REPORT

VIA E-FILING

The Honorable Mary Pat Thyng
United States District Court
Federal Building
844 King Street
Wilmington, Delaware 19801

Re: Vernetta Walker v. The News Journal and Ann Hines
Civil Action No. 06-138-MPT

Dear Judge Thyng:

As requested by the Court in its scheduling order dated March 22, 2007 (the "Scheduling Order"), this letter serves as the parties' interim status report. I have talked by telephone with *pro se* plaintiff Vernetta Walker; she is in agreement with the items included in this letter and has nothing additional to add at this time other than as noted herein.

Here is a status report on the following pertinent items:

1. Motion to Dismiss. On August 14, 2006, defendants each filed a motion to dismiss along with a brief in support. After some delay and an extension of the briefing schedule, Ms. Walker filed her answering brief in opposition to the motions to dismiss on August 3, 2007. In response, on August 13, 2007, defendants replied by letter to the Court. Ms. Walker filed what has been deemed a supplemental response on September 13, 2007, expanding the type of request she is seeking (which she had stated during her deposition). The matter is fully briefed and awaiting the Court's decision. As stated in my letter of August 13, 2007, if the motions are fully granted by the Court, it will dismiss all claims against Ann Hines in her individual capacity and will dismiss the race and age claims against The News Journal. The disability claim filed by Ms. Walker was not at issue in The News Journal's motion to dismiss.

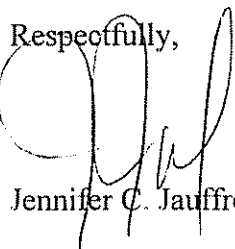
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2. Discovery. Pursuant to the Scheduling Order, all discovery was to be initiated so as to be completed on or before Friday, September 14, 2007. Although Ms. Walker did not file her discovery responses until July 13, 2007 and answer defendants' motions to dismiss until August 2007, the parties do not believe there is a need for an extension at this time. Ms. Walker did provide some documents in response to defendants' requests, but indicated that she could not locate a number of other documents and was still looking. To date, defendants still have not received these missing documents, but it appears unlikely they will be found. Defendants took Ms. Walker's deposition on August 16, 2007. Soon thereafter, defendants filed subpoenas for additional documents, which we learned about during Ms. Walker's deposition. Upon receipt of those documents, defendants found the need to serve a few requests for admission on Ms. Walker. Those requests were mailed on September 7, 2007 to Ms. Walker, which Ms. Walker responded to on September 13, 2007. Ms. Walker does not intend to take any discovery in this matter other than the written discovery she previously requested, to which defendants responded. However, Ms. Walker may supplement her initial disclosures to list character witnesses. If so, defendants reserve the right to later depose such individuals if the case is not dismissed at the summary judgment stage.

3. Motion for Summary Judgment. Defendants intend to file a motion for summary judgment on or before October 5, 2007. Ms. Walker is aware that she will have two weeks from that date to file her answering brief. Defendants will timely respond pursuant to the Court's Local Rules on briefing.

4. Expert Discovery. As potentially contemplated in the Scheduling Order, defendants would ask the Court to waive the requirements regarding expert testimony until a minimum of 60 days after the Court issues its opinion in regards to defendants' summary judgment motion (should the motion be denied in whole or in part).

The parties have nothing further to report to the Court. If the Court needs further explanation or detail, please do not hesitate to call me or Ms. Walker. Otherwise, the parties will contact the Court on September 28, 2007 at 9:00 a.m. as scheduled.

Respectfully,

Jennifer C. Jauffret

/kdm

cc: Ms. Vernetta Walker (via first class mail)
Peter T. Dalleo, Clerk (via hand delivery)
Ms. Dolores Pinto (via first class mail)